IN THE UNITED STATES BANKRUPTCY COURT 10 2015 FOR THE EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION EASTERN DISTRICT OF MICHIGAN EASTERN DISTRICT OF MICHIGAN

| In re: |) | Chapter 9 |
|----------------------------|---|-----------------------|
| CITY OF DETROIT, MICHIGAN, |) | Case No. 13-53846 |
| |) | Hon. Thomas J. Tucker |
| Debtor. |) | |

EX PARTE MOTION OF STEVEN WOLAK, AS PERSONAL REPRESENTATIVE OF THE ESTATE OF CHRISTOPHER WOLAK, DECEASED, FOR LEAVE TO FILE MOTION TO COMPEL PAYMENT BY DEBTOR PURSUANT TO SETTLEMENT CONTRACT, OR ALTERNATIVELY, VOID SETTLEMENT CONTRACT AND REINSTATE CASE IN THE TRADITIONAL MANNER

(9399 WEST TEN MILE ROAD + SOUTHFIELD, MICHIGAN 48075, 2463 + TELEPHONE (248) 355-5555 +

Now comes STEVEN WOLAK, as Personal Representative of the Estate of CHRISTOPHER WOLAK, Deceased, by and through his undersigned counsel, and for his *Ex Parte* Motion for Leave to File Motion to Compel Payment by Debtor Pursuant to Settlement Contract, or Alternatively, Void Settlement Contract and Reinstate Case (Motion) in the Traditional Manner, respectfully states as follows:

1. Counsel for STEVEN WOLAK, as Personal Representative of the Estate of CHRISTOPHER WOLAK, Deceased ("Elaimort"), understands that represented parties in this matter are to use the Court's electronic filing system; however, undersigned counsel does not have an

13-53846-tjt Doc 9956 Filed 06/10/15 Entered 06/10/15 16:40:50 Page 1 of 2

ECF login and/or password for the United States Bankruptcy Court for the Eastern District of Michigan.

- 2. Claimant opposes the proposed distribution of his claim under the Plan for the reasons set forth in his Motion, and respectfully requests that this Court grant him permission to file said Motion in the traditional manner.
- 4. Claimant is filing said Motion contemporaneously with this Motion, and a Proposed Order.

WHEREFORE, Claimant respectfully requests that the Court GRANT his Motion for Leave to File his Motion in the Traditional Manner.

Respectfully submitted,

FIEGER, FIEGER, KENNEY & HARRINGTON, P.C.

GEOFFREY N. FIEGER (P30441)
DAVID A DWORFTSKY (P67026)

DAVID A. DWORETSKY (P67026)
Attorneys for Steven Wolak as Pe

Attorneys for Steven Wolak, as Personal Representative of the Estate of Christopher Wolak, Deceased

19390 W. Ten Mile Road

Southfield, MI 48075

(248) 355-5555

June 10, 2015

PHECER LAW • A PROFESSIONAL CORPORATION • ATTORNEYS AND COUNSELORS AT LAW • 19390 WEST TEN MILE ROAD • SOUTHFIELD, MICHIGAN 48075, 2463 • TELEPHONE (24), 355-5555 • EAX (24), 355-5146